









### FASS - PH

Spring/Summer 2019

Session 2:
Financial Reporting
Models and
Reporting
Requirements

### Overview

- Describe the financial reporting requirements under UFRS
- Provide a brief introduction to the FASS-PH System
- Discuss the different financial reporting models
  - A description of each reporting model
  - The applicability of each model based on a PHA size
  - FDS reporting requirements for each model





**FASS Reporting Requirements** 

# Uniform Financial Reporting Standards

- Applicability
- Submission of Financial Information
- Reporting Compliance Dates
- Annual Financial Report Filing Dates
- Responsibility for Submission of the Financial Report



## **Applicability**

- UFRS Rule is applicable to all entities that receive HUD Financial Assistance:
  - Low-rent, Section 8, Combined, and Multifamily
  - PHAs that are non-profits, part of non-profits, or part of another government (e.g., department of a city)
  - Moving to Work PHAs



### Submission Due Dates

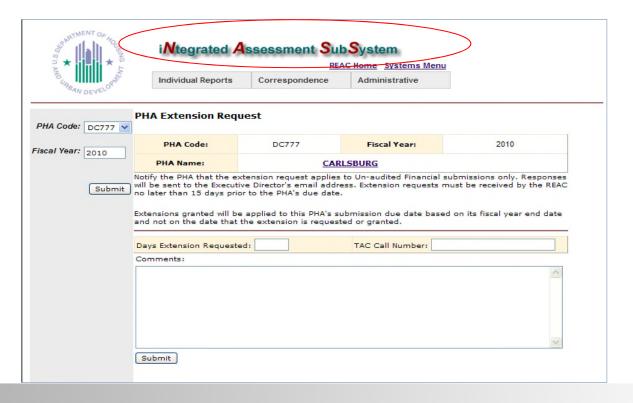
#### Financial Reporting Schedule Due Date

Fiscal Year End (FYE)	06/30	09/30	12/31	03/31
Unaudited (due 2 months after FYE)	08/31	11/30	02/28	05/31
Audited (due 9 months after FYE)	03/31	06/30	09/30	12/31



## **Extension Request**

- Request Additional Time for an Unaudited Submission
- Request is Due 15 days prior to the Submission Due Date





## Waiver Request

- Request Additional Time for an Audited Submission
- PIH Notice 2009-41
- Written request to local field office
  - Request is Due 30 days prior to Submission Due Date
  - Include Verifiable Justification
  - Include Reference to Applicable Regulation





## The FASS-PH System

### Introduction to the FASS-PH System

- Meets UFRS Requirements
  - GAAP-based System
  - Web-based Electronic System
  - In Form and Substance as prescribed by HUD
- In conformity with Final Rule: Revisions to Public Housing Operating Fund Program
  - Asset Management Model
  - Project Level Reporting
  - All PHAs must use the same FDS Template



# Introduction to the FASS-PH System, cont'd.

- Part of HUD's Monitoring and Oversight Responsibilities
  - Helps Assess Financial Health & Compliance
  - Identifies Possible Instances of Waste, Fraud, and Abuse
  - Helps in Risk Ranking of Portfolio
  - Used to Inform Policy Decisions
  - Used in Funding Formulas



### **FASS-PH Website**

HUD > Program Offices > Public and Indian Housing > Real Estate Assessment Center (REAC) > REAC > Financial Assessment of Public Housing Agencies Financial Assessment of Public Housing Agencies Print Friendly Version 🖸 SHARE 🔣 🗷 🖂 ... (FASS PHA) Systems Information \*\*\* Login to FASS PH FASS PH reviews the annual financial statements of over 4,000 public housing agencies and section 8 only entities in the country to assess their financial condition and risk, Registration Instructions PHA User Quick Tips PHA Coordinator Quick Tips Mixed Finance General Guidance on the Definition of a Mixed Finance Property Step by Step Guide for PH Coordinator Properties Within the Office of Public and Indian Housing (PIH), there are various "definitions" of a Coordinator: Assign roles to staff, accountant & mixed finance property. In addition, a number of data sources are being used to determine a auditors property's mixed finance status for different purposes. To date, there has not been a controlling definition of a mixed finance property nor a single data source that is relied on to determine a Password Reset property's status. To address this, the following guidance is provided: Entering mixed finance FASS PH User Guide Only those properties with a fully executed mixed finance amendment to their property status in the "Mixed Annual Contributions Contract (ACC) will be considered mixed finance for PHAS FASS System Updates scoring and future operating subsidy funding calculations. (Under PHAS, mixed Finance Exempt from FASS PH XML Interface finance properties do not receive a FASS or a Management Operations score) FASS-ph' field in IMS/PIC. Changes in XML Interface . Beginning with fiscal year end September 30, 2016, and continuing thereafter, the data source for whether a property is mixed finance will be the "FASS ph" indicator Other REAC Systems (i.e. MASS, NASS, etc.) in the Inventory Management System/PIH Information Center (IMS/PIC) (see REAC Customer Service (TAC) below). If a property is mined finance (and therefore has a fully executed mined finance ACC amendment) the "FASS ph" indicator should be marked "yes." LEARN MORE 1 2 3 4 5 6 7 8 9 **Useful Links** View all Highlights: complete listing of past and current highlighted information in FASS PH affecting compliance and financial reporting to HUD by public housing agencies and section 8 only entities. CFDA - HUD Programs Financial Submission Tools Other Information 3 Federal Register GASB Accounting Briefs Asset Management GAO (Yellow Book) Calendar of Financial Submission Appeal & Waiver Process HUD Library Frequently Asked Questions Appeals & Waivers Submitted to NASS ► PIH Notices FDS Line Definition Guide - July 2014 Appeal Process 24 CFR Housing and Urban Development Waiver Request Process FDS Submission Upload Tool MB Circulars (A-87 & A-133) Find Your Financial Analyst Documents & Guidance OMB Guidance for Grants & Agreements (2 CFR 200) Financial Scoring Notices GAAP Flyers GASB Statements Updated in the FDS PHAS & UFRS Rule Program & Entity Reporting in the FDS FASS PH Team Submission Tips



# Asset Management/Project-Based Accounting Website

#### **Project-Based Accounting**

#### Overview

The third core reform under asset management is project-based accounting. Project-based accounting provides the ability to track financial performance at the project-level. Ultimately, project-based accounting provides the necessary information to make effective decisions at the project-level.

- As with other federally-assisted housing programs, PHAs will be required to submit to HUD
  year-end financial statements on each project. These financial statements will include revenue,
  expense, and balance sheet items.
- Further, PHAs will only be able to charge projects for services actually received. For example, in
  accounting for project costs, PHAs will not be permitted simply to spread the cost of central
  maintenance across projects.
- Lastly, any overhead fees and any fees for centrally-provided property management services, must be considered reasonable. This means that the costs must not exceed what other efficient operators would incur for those same services in the local market.

#### Resources and Links

- (NEW) Special Instructions for Preparing Financial Data Schedules for Moving to Work Agencies
- Guidance on Asset Management Provisions in the Consolidated Appropriations Act, 2008
- Special Year-End Financial Reporting Issues for Demolition/Disposition Projects (08-17-2009)
- Information Regarding the September 2009 System Release and the Impact on Public Housing Agency (PHA) Annual Financial Submissions
- ► Capital Fund Stimulus Grant Reporting
- Clarification of Phase-in-Fees (11-24-2008)
- Financial Data Schedule Line Definition Guide, November 2008 (Updated May 2012)
- Asset Management FASS-PH Submitting a Financial Data Schedule Pre-view Demonstration
- FASS PH Excel Version of the Financial Data Schedule
- PIH Notice 2007-9 Updated Changes in Financial Management and Reporting for Public Housing Agencies Under the New Operating Fund Rule (24 CFR Part 990), issued April 10, 2007.
- PIH Notice 2007-9 Supplement to Financial Management Handbook Office of Public and Indian Housing (PIH) Revised April 2007
- PIH Notice 2007-9 Comments
- Capital Fund Reporting
- Eligible Uses of Funds
- FDS Under Asset Management & Reporting Briefs
- Eligible Uses of Operating Fund Program Receipts
- Fiscal Year End Changes
- ▶ Insurance
- Schedule of Key Asset Management Provisions
- 2013 Schedule of Management Fees



Print Friendly Version



### Additional HUD Resources

#### Housing Choice Voucher Program

Additional financial and accounting related information, including information on the Voucher Management System (VMS) related to the HCV program and other PIH voucher programs (i.e., Disaster Voucher program (DVP)), can be found at:

http://portal.hud.gov/hudportal/HUD?src=/program offices/public indian housing/programs/hcv

#### Public and Indian Housing One-Stop Tool (POST) for PHAs

POST website provides in one place, commonly used links to PIH systems, tools, training, opportunities, program requirements, and commonly used external websites. The website can be found at:

http://portal.hud.gov/hudportal/HUD?src=/program offices/public indian housing/post



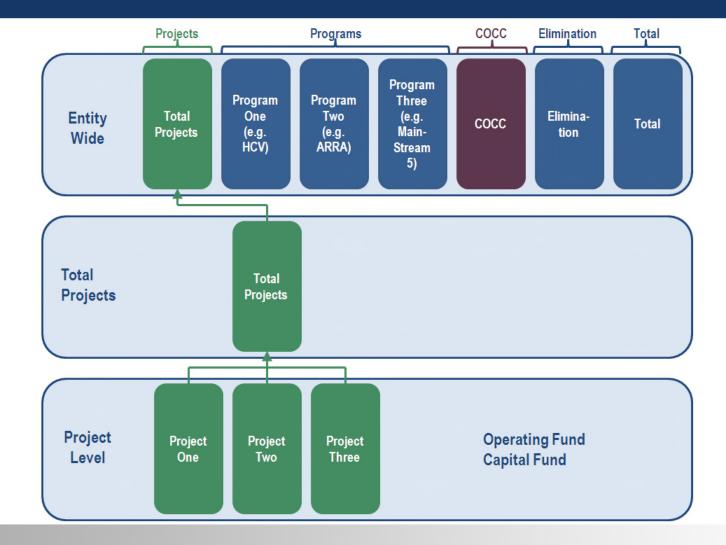


## Financial Reporting Models

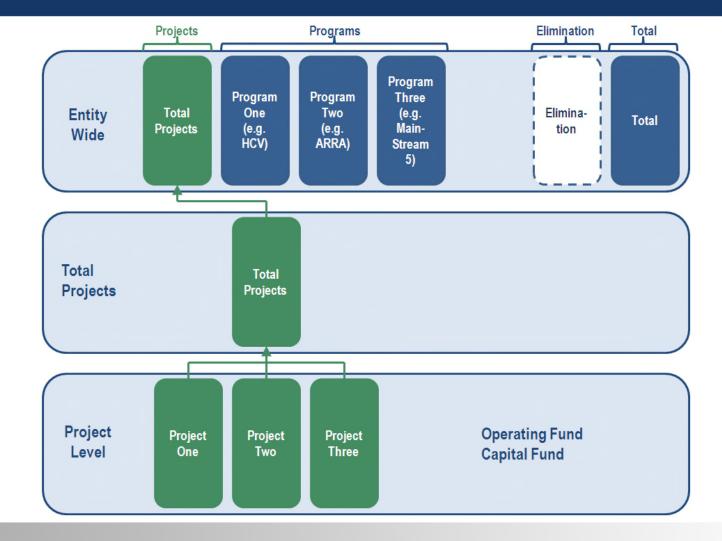
## Four Reporting Models

- Model 1 Asset Management with COCC
- Model 2 Asset Management using Allocated Overhead
- Model 3 Non-asset Management
- Model 4 Small PHAs under Asset Management
- HUD Accounting Brief #16

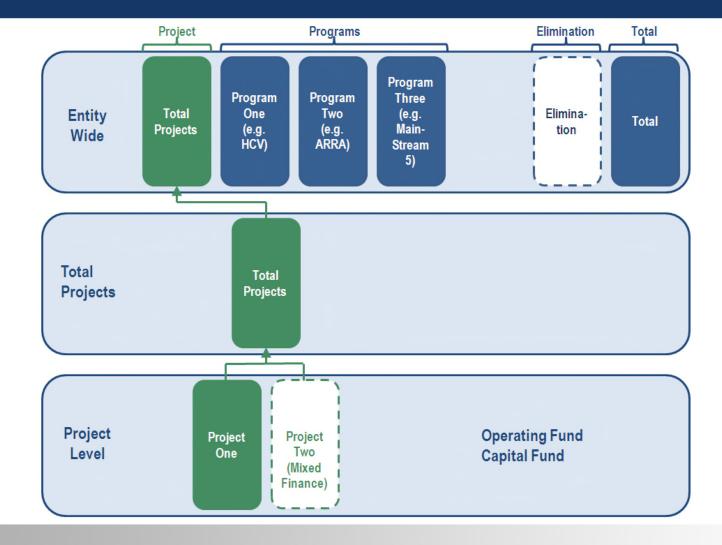




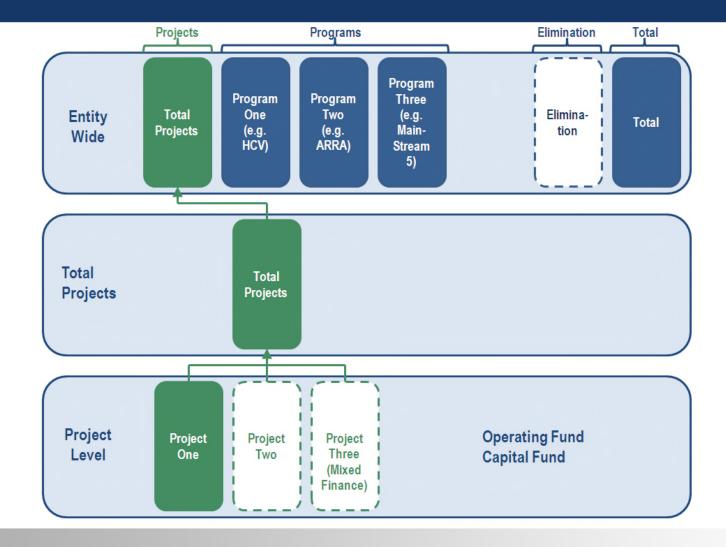














# Asset Management Reporting Models and FDS Reporting Types

FDS Reporting Types	<b>Model 1</b> PHAs under Asset Management <u>with</u> COCC	Model 2 PHAs under Asset Management with Allocated Overhead and no COCC	<b>Model 3</b> PHAs not under Asset Management	Model 4 Small PHAs under Alternate Asset Management Method
1. Non-Asset Mgmt with Elimination Only			•	
2. Non-Asset Mgmt with COCC/Elimination				
3. Non-Asset Management			•	
4. Asset Mgmt without COCC/Elimination		•		•
5. Asset Mgmt with Elimination		•		•
6. Asset Mgmt with COCC/Elimination	•			



### Cost Reasonableness

 All PHAs reporting under asset management were required to comply with Cost Reasonableness by 2011.

	Per Financial Mana	Current HUD Guidance	
PHA Fiscal Year End	Project-based Budgets and Project-based Accounting	Cost Reasonableness	Cost Reasonableness
June	07/01/2007 through 06/30/2008 and after	07/01/2008 through 06/30/2009 and after	07/01/2010 through 06/30/2011 and after
September	10/01/2007 through 09/30/2008 and after	10/01/2008 through 09/30/2009 and after	10/01/2010 through 09/30/2011 and after
December	01/01/2008 through 12/31/2008 and after	01/01/2009 through 12/31/2009 and after	01/01/2011 through 12/31/2011 and after
March	04/01/2008 through 03/31/2009 and after	04/01/2009 through 03/31/2010 and after	04/01/2011 through 03/31/2012 and after





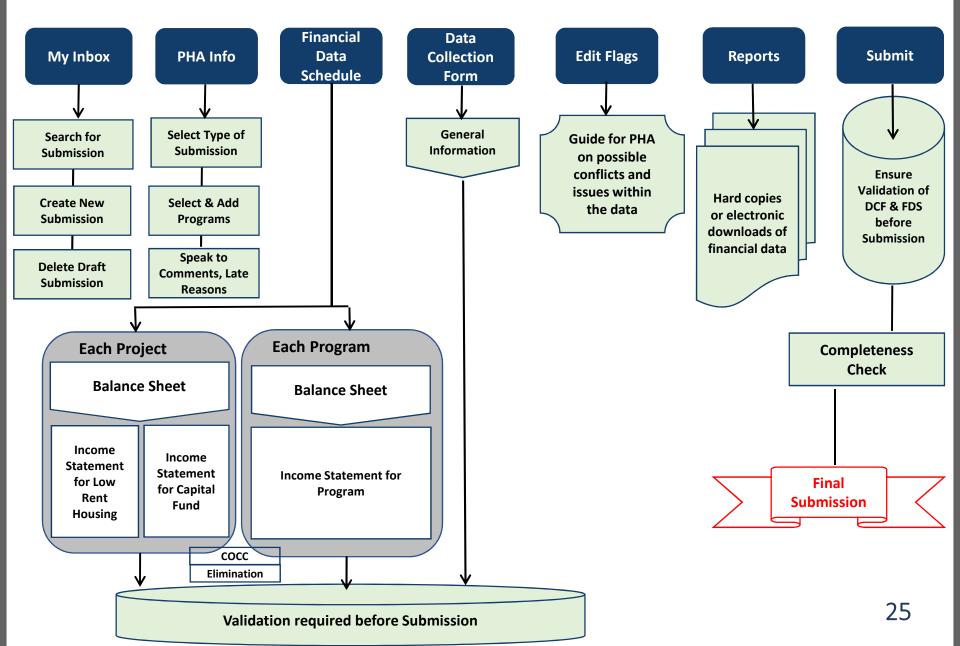
# Understanding the Unaudited Submission Process

### **Unaudited Submission Overview**

- All PHAs are required to submit unaudited financial data to HUD.
- The unaudited submission generally consists of:
  - Financial Data Schedule (FDS)
  - Data Collection Form (DCF) General Information tab only
  - Submission Comments
- Submission Comments
  - While optional, it is strongly suggested that the PHA address any issues that were questioned in prior REAC reviews and any other reporting requirements that may cause the submission to be rejected.

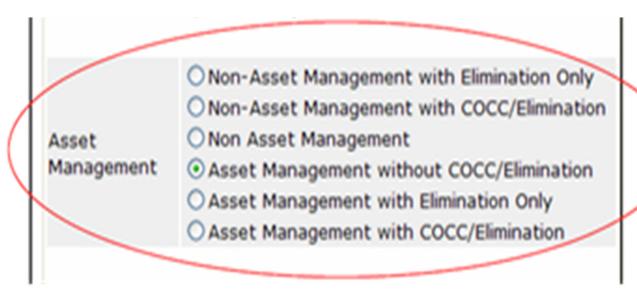


#### **Unaudited Submission Process**



# PHA Info Screen: Asset Management Types

- Asset management is a business model that is used by PHAs administering public housing.
- The PHA must select an asset management type on the PHA Info Screen.







# Understanding the Audited Submission Process

# Audited Submission: 3-Step Procedure

#### Draft Status

- PHA creates a draft "Audit Submission" (Upload unaudited submission and make any changes required)
- Unlike Unaudited Submissions, the Audited Submission must include:
  - Notes to Financial Statements
  - Audit Info
  - ◆ Action plan, if applicable
  - Audited Financial Statements
  - Management Discussion & Analysis (MD&A)
  - Audit Findings
- Once submitted, status changes to "IPA Review"



# Audited Submission: 3-Step Procedure

#### 2. IPA Review Status

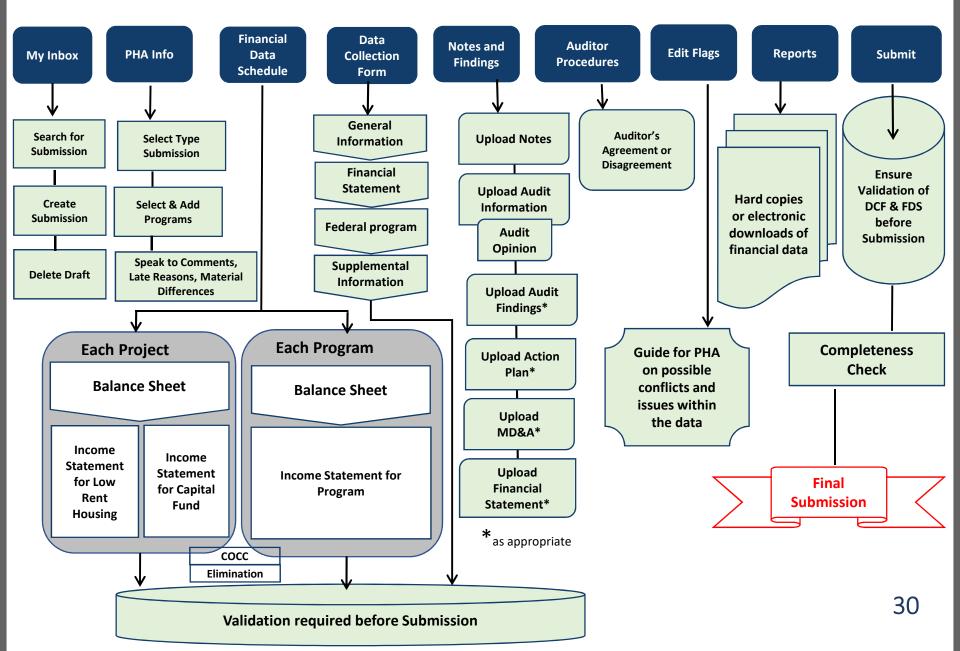
- IPA performs agreed upon procedures (AUP)
- Status changes to "IPA Agree" or "IPA Disagree"
- If IPA disagrees, PHA must edit "IPA Disagree Submission"

#### 3. Submission to HUD

- One CPA approves the AUP (Step 2), PHA must Submit the Audited Statements
- 4. HUD Review and Acceptance
  - PIH-REAC reviews and approves or rejects submission
  - Process is complete once audited submission is approved



#### **Audited Submission Process**





## **Data Collection Form**

### Data Collection Form

- Unaudited Submission
  - Includes General information for PHA
    - Name, address, contact info, etc.
    - Auditor information
    - ◆ Fee Accountant information
    - Federal Awards expended data
- Audited Submission
  - The DCF consists of the following 4 tabs:
    - ◆ General Information
    - ◆ Financial Statements
    - ♦ Federal Programs
    - ◆ Supplemental Information



### DCF – General Information Tab



#### Real Estate Assessment Center

Financial Assessment Subsystem (FASS-PH)

FDS	DCF S	ubmit	Edit Flags	Reports	Logout
4-	_				
				F	PHA Information
PHA	Code				CA999
PHA	Name				Hometown Housing Authority
Fisc	al Year En	d Date	e:		06/30/2015
Subi	mission Ty	rpe:			Unaudited/A-133

Unaudited / Single Audit

General Information				
Element#	Description	Value	Details	
*G9000-010	Fiscal Year Ending Date	06/30/2015		
*G2000-021	Reporting Period Covered	None 💌		
*G2000-031	Reporting Period Covered - Months			
*G9000-020	Employer Identification Number			
*G2000-040	Multiple EIN Indicator	None V		
*G9000-030	Data Universal Numbering System (DUNS) Number			
*G2000-050	Multiple DUNS Indicator	None 💌		



# DCF – Financial Statements Tab: Audit Details

- Audit Details Page requests Fund Type and Fund Opinion
  - PHAs are required to enter the Fund Type and Fund Opinion for each opinion unit
  - An opinion unit is a major fund or group of non-major funds that receive a financial statement opinion by the auditor
  - If the PHA is reporting only a single fund all fund types should be marked as "major"
- The DCF is requesting information on the fund type and fund opinion that the CFDA Program is contained in. The DCF is NOT asking for a financial statement audit opinion of the CFDA Program.

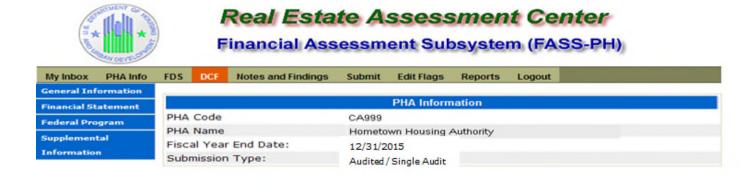


# DCF – Financial Statements Tab: Audit Details, cont'd.

CFDA#	NAME OF PROGRAM		DETAIL
14.850	Fund Type and Opinion of the Fo Low Rent Public House		
*G3000-200	Fund Type	Non Major Fund	
*G3000-210	Fund Opinion	Unmodified Opinion	
*G3000-220	Is the Departure or qualification related to the Low Rent Program?	No 💌	
14.872	Fund Type and Opinion of the Fe Public Housing Capital Fund		
*G3000-200	Fund Type	Non Major Fund 💌	
*G3000-210	Fund Opinion	Unmodified Opinion	***
*G3000-220	Is the Departure or qualification related to the Capital Fund Program?	Yes 💌	
14.866	Fund Type and Opinion of the Fe Revitalization of Severely Distress		
*G3000-200	Fund Type	Major Fund 💌	
*G3000-210	Fund Opinion	Modified Opinion	
8	Fund Type and Opinion of the Fo Other Federal Progra		
*G3000-200	Fund Type	Major Fund	
"G3000-210	Fund Opinion	Modified Opinion	
14.871	Fund Type and Opinion of the Fo Housing Choice Vouc		
		TAXABLE CONTRACTOR OF THE PARTY	
*G3000-200	Fund Type	Major Fund 💌	***



### DCF – Financial Statements Tab



	Financial Statement			
	Element#	Description	Value	Details
	*G3000-005	Financial Statements Using Basis Other Than GAAP	No 💌	
	*G3000-010	Type of Audit Report	<ul><li>Modified Opinion</li><li>Unmodified Opinion</li><li>Adverse Opinion</li><li>Disclaimer of Opinion</li></ul>	<u>Details]</u>
	*G3000-020	Going Concern Indicator	Yes Y	
	*G3000-030	Significant Deficiency Indicator	Yes 💌	[Details]
ellow Book—	*G3000-040	Material Weakness Indicator	Yes 💌	[Details]
	*G3000-050	Material Noncompliance Indicator	Yes 💌	[Details]
	*G3000-060	Fraud	Yes 💌	[Details]
	*G3000-070	Illegal Acts	Yes 💌	[Details]
	*G3000-080	Abuse	Yes	[Details]

\*mandatory field



## DCF – Financial Statements Tab, cont'd.

- Values selected on financial statements tab must match:
  - Auditor's Report on Financial Statements
  - Auditor's Report on Compliance and Internal Control over Financial Reporting
  - If the auditor notes any significant deficiencies (G3000-030) or material weaknesses (G3000-040), the respective box should be marked with a "Yes" on the financial statements tab.



## DCF - Federal Programs Tab



#### Real Estate Assessment Center

My Inbox PHA Info	FDS	DCF	Notes and Find	dings Su	bmit	Edit Flag	s Reports	Logou
General Information								1
Financial Statement			PH	A Informa	tion			
Federal Program	PHA	Code:	PHA	Fiscal Y	ear E	nd Date: 1	12/31/2015	
Supplemental	PHA Name:		Housi	Housing Author		PHA Co	inty	
	Subr	Submission Type: Audited/Single Audit						
Information								•

Federal Program						
Element#	Description	Value	Details			
*G4000-020	Dollar Threshold Used to Distinguish Type A and Type B Programs	\$750,000				
*G4000-030	Low-Risk Auditee Indicator	Yes				
*G4000-040	Indicator-Any Audit Findings Disclosed that are Required to be Reported Yes					
*G4000-080	Was a Schedule of Prior Audit Findings prepared?	Yes				
*G4100-040	Total Federal Awards Expended	\$8,885,997	[Details]			

<sup>\*</sup>mandatory field



### DCF – Financial Programs Tab, cont'd.

- The Federal Programs page includes dollar threshold, opinion and findings, agency risk indicator, and Total Federal Awards Expended (TFAE).
- Information reported should match:
  - Auditor's Report on Compliance and Internal Control (Major Program),
  - Auditor's Schedule of Expenditure of Federal Awards (SEFA), and
  - Auditor's Schedule of Findings and Questioned Costs



### DCF – Federal Programs TFAE Details

14.871	Housing Choice Vouchers		
*G4100-030	Amount Expended	\$7,338,716	
*G4200-010	Major Federal Program Indicator	Yes	
*G4200-050	Type of Opinion on Major Federal Program	Unmodified Opinion	
*G4200-060	Number of Single Audit Compliance Audit Findings	0	[Details]
G4200-070	Audit Finding Reference Number		
*G4200-090	Are Awards Received Directly from a Federal Agency?	Yes	
*G4200-100	Significant Deficiency Indicator	No	
*G4200-110	Material Weakness Indicator	No	
*G4200-120	Material Non-compliance Indicator	No	
*G4100-050	Total Amount of Questioned Costs	\$0	



### DCF – Supplemental Information Tab



#### Real Estate Assessment Center

Financial Assessment Subsystem (FASS-PH)

My Inbox	PHA Info	FDS	DCF	Notes and Findings	Submit	Edit Flags	Reports	Logout
General Inf	ormation	-						
Financial St	atement					PHA Inform	ation	
	Federal Program		Code:	e: Fiscal Y			ar End Da	te 12/31/20
		PHA	Name:					
Supplement	tal	Subn	nission	Type:	Audited /	Single Audit		
Information	n	50011		. / / / /	,			

Supplemental Information					
ELEMENT#	DESCRIPTION	VALUE	DETAILS		
*G3100-040	SAS 119 "in relation to" Opinion on the Financial Data Schedule	Fairly Stated			
Required Supplemental Information					
*G3100-050	Is MD & A omitted? (For PHAs reporting as a non-profit, select "No" for this element. This question should be skipped for all component unit submissions.)	No			
*G3100-060	Are other supplemental Information Omitted?	No			

\*mandatory field





# PHA Information Screen and Component Unit Check Box

### The Component Unit Check Box

- Two criteria must be met in order to select the Component Unit box on the PHA Info page:
  - PHA is a component unit, department or program of a local government or jurisdiction or nonprofit agency.
  - PHA will not have its own separate Single Audit (or non Single Audit).
- Checking the CU box is not simply an issue of whether the entity is a component unit as defined by GASB.



## The Component Unit Check Box, cont'd.

- For PHAs that select the Component Unit box, there are 4 required attachments:
  - Notes to Financial Statements,
  - Audit information (currently mandatory),
  - Audit Findings (if applicable), and
  - Action Plan (if applicable)
- All other PHAs must submit the required audit attachments based on the audit type selected.





## Required Audit Attachments

## Required Audit Attachments: Uniform Guidance (UG) Audit

#### Uniform Guidance Audit:

- RSI (MD&A and GASB 68)
- 2. Basic Financial Statements: Statement of Net Position, Statement of Revenues, Expenses and Changes in Net Position, Statement of Cash Flows
- 3. Notes to the Basic Financial Statements
- 4. Auditor's Report on Financial Statements
- 5. Auditor's Report on Compliance and Internal Control (Government Auditing Standards)
- Auditor's Report on Compliance and Internal Control (Major Program)
- 7. Schedule of Expenditure of Federal Awards
- 8. Schedule of Findings and Questioned Costs
- 9. Schedule of Prior Audit Findings
- 10. Corrective Action Plan



### Required Audit Attachments: Non UG Audit

- Non Non-Single Audit (Yellow Book Audit):
  - Required Supplemental Data (MD&A and GASB 68)
  - Basic Financial Statements: Statement of Net Position, Statement of Revenues, Expenses and Changes in Net Position, Statement of Cash Flows
  - 3. Notes to the Basic Financial Statements
  - 4. Auditor's Report on Financial Statements
  - 5. Auditor's Report on Compliance and Internal Control (Financial Reporting)



### Required Audit Attachments

- Audit Information must be attached to the appropriate section of the Notes & Findings page
  - 1. RSI (MD&A and GASB 68)
  - 2. Financial Statements
  - 3. Notes to the Financial Statements
  - 4. Audit Information
  - 5. Audit Findings
  - 6. Action Plan



## Required Audit Attachments: MD&A



#### Real Estate Assessment Center



MD & A				
Element	Description	Value		
CE0E0 010	Management 's	Browse		
G5050-010	Management 's Discussion & Analysis	Upload File(Max size is 30MB)		

- Provides an analytical overview of the PHA's financial activities
- Topics prescribed by GASB 34 to be included in the MD&A:
  - Brief discussion of basic financial statements
  - Comparative analysis of current and prior year financial information
  - Known information expected to impact financial operations
  - Reported figures and data must be consistent with FDS, F/S, DCF

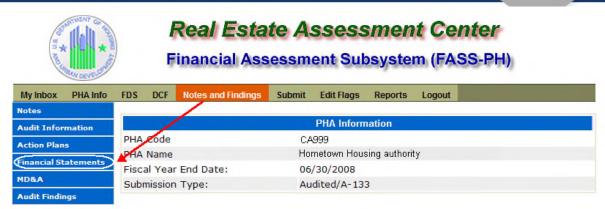


## Required Audit Attachments: GASB 68

- New FDS Lines in REAC template
  - 200 Deferred Outflows
  - 357 Accrued pension and OPEBs
  - 400 Deferred Inflows
- 10-year schedules regarding:
  - Sources of changes in the components of NPL
  - Ratios that assist in the assessing the magnitude of the NPL
  - Comparisons of actual employer contributions to actuarially required amounts



## Required Audit Attachments: Financial Statements



Description

Government-wide AND OR

**Financial Statements** 

- Government-wide Financial Statements
  - Statement of Net Position
  - Statement of Activities
  - Statement of Cash Flows (full accrual)
- Fund Financial Statements
  - Statement of Net Position
  - Statement of Revenues, Expenses, and Changes in Net Position

Element

Statement of Cash Flows



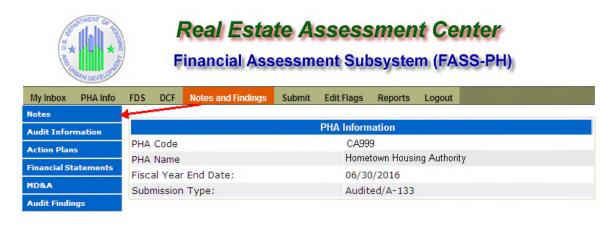
Value

Browse.

Upload File(Max size is 30MB)

### Required Audit Attachments: Notes to Financial Statements

- The attached Notes tab:
  - Should be Completed and Properly Presented
  - Amounts should tie to FDS and/or F/S
- Topics include:
  - Summary of Significant Accounting Policies
  - All Other Disclosures



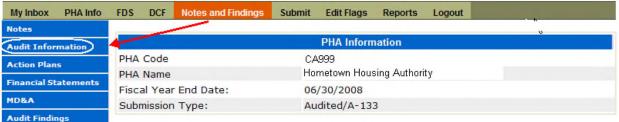




## Required Audit Attachments: Audit Information



#### Real Estate Assessment Center





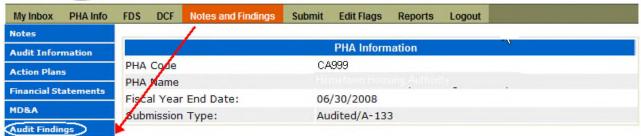
- The following attachments belong in the Audit Information Tab:
  - Auditor's opinion and Financial Statements
  - Auditor's Report on Compliance Internal Controls (Yellowbook Report)
  - Auditor's Report on Internal Compliance and Internal Control (Major Programs)
  - SEFA should match TFAE (including CFDA #) on DCF



# Required Audit Attachments: Audit Findings



#### Real Estate Assessment Center



Audit Findings				
Element	Description	Value		
CE200 010	Audit Finding(Current &	Browse		
5200-010	Audit Finding(Current & Prior Year Findings)	Upload File(Max size is 30MB)		

- Summary Schedule of Prior Audit Findings
- Auditor's Schedule of Findings and Questioned Costs
  - Summary
  - Financial Statement Findings
  - Federal Program Findings
- Verify that all opinions and findings match DCF



## Required Audit Attachments: Action Plan



#### Real Estate Assessment Center



Action Plans				
Element	Description	Value		
G5300-010	Corrective Action Plan (Current & Prior Year Findings)	Upload File(Max size is 30MB)		

- Required if findings are reported for financial reporting and (or) federal programs
- Corrective Action Plan should include:
  - Identification of each finding and reference
  - Description of action taken or explanation
  - Name of contact person responsible for corrective action (BE SURE!!)
  - Anticipated completion date of corrective action





# AU-C 725 and Auditor Attestation

# Supplementary Information (SI) and AU-C 725 Opinion

- SI is presented for purposes of additional analysis and is not a required part of the financial statements:
  - ◆ SEFA required by Uniform Guidance
  - ◆ FDS required by HUD
- SI is presented based on AU-C 725: Reporting on Information Accompanying the Basic Financial Statements in Auditor-Submitted Documents



### **Auditor Attestation**

- Auditors are required to perform Agreed Upon Procedures (AUP) in order to assure the accuracy and completeness of the data submitted to PIH-REAC.
- Auditor compares the electronic data in the draft FASS-PH submission to the hard copy of the basic financial statements, audit reports, and FDS.





Common Reporting Issues: Unaudited & Audited Submissions

# Common Reporting Problems: Unaudited Submission

- FASS Data is Materially Different than Other Independent Data Sets
  - Voucher Management System (VMS) examples include:
    - Housing Assistance Payments
    - Vouchers Leased
    - ◆ Interest Income
    - ◆ Port-in Information
    - ◆ NRP, UNA, and Cash Balances
    - ◆ Fraud
    - ◆ FSS Escrow Forfeitures
  - Revenue doesn't agree to HUD
    - ◆ HUDCAPS
    - **◆** ELOCCS



# Common Reporting Problems: Unaudited Submission, cont'd.

- HCV Compliance and Financial Distress (not rejected if correctly reported)
  - ◆ Due From's and Operating Transfers Out
  - Negative Equities
  - ◆ Unit months leased greater than unit months available
- Submission Fails Basic Business Rules



# Common Reporting Problems: Unaudited Submission, cont'd.

- Other General Reporting Problems
  - PHA failed to report programs or programs are comingled with other programs
  - NRP Adjustment is not reflected in submission
  - Elimination column incorrect
  - Bank overdrafts
  - Debt reported incorrectly
  - Interfund amounts on lines 144 & 347
  - Management fee calculations
  - Security deposits liability & cash
  - Equity accounts



# Common Reporting Problems: Unaudited Submission, cont'd.

- Other general reporting problems:
  - Restricted cash vs. Unrestricted cash
  - Validation errors
  - Capital funds Hard & soft costs and revenue
  - Negative expense lines
  - DCF differences
  - Memo fields
  - Prior period adjustments
  - Transfers
  - Unreported PH units



## Common Reporting Problems: Audited Submission

- AU-C 725 opinion on FDS is missing.
- PHA submission type is incorrect, therefore, the wrong attachments were submitted.
- Federal Awards Expended reported in Audit Report is different that what was reported on the Data Collection Form in the system.
- Financial Statements and associated information do not meet minimum professional requirements.



# Common Reporting Problems: Audited Submission, cont'd.

- Auditors Reports do not reconcile to the Data Collection Form (opinions, findings, federal awards expended).
- Financial Statements do not reconcile to the FDS and the differences are material.
- MD&A, Financial Statements, and Notes to the Financial Statements do not reconcile to each other.





## **Submission Decision**

### **Submission Decision**

 REAC's goal is to approve a financial submission that is properly classified and shows data that is a fair reflection of the PHA's financial condition.

Recommendation	Description
Accept	No errors noted and all prior issues corrected
Conditionally Accept	Issues noted, but deemed immaterial
Reject	Errors and/or issues noted that are material or a significant number of small issues are present that cause the submission to be unreliable



## Submission Decision, cont'd.

- Keeping in mind REAC's goal, submissions are generally conditionally accepted unless the errors or issues noted are material, meaning the FDS may not provide a fair reflection of the PHA's financial condition.
- Conditionally accepted issues need to be addressed on the audited submission (or next submission).
- Rejected submissions need to be corrected and resubmitted within 15 calendar days of rejection.



## Notification and Follow-Up

- PHAs receive notification of conditional acceptance and rejections via NASS.
- Reminder, past due and other notifications are automatically sent to PHAs.
- These notifications are sent using the PHA's email address as reported in PIC.



Notes: 70





